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June 16, 2021

*Via ECF*

Hon. Alvin K. Hellerstein  
United States Magistrate Judge  
United States District Court, Southern District of New York  
500 Pearl Street, Courtroom 14D  
New York, New York 10007-1312

Re: Maria Jose Pizarro v. Euros El Tina Restaurant Lounge and Billiards, et al.,  
SDNY Case No. 20 Civ. 5783 (AKH)

Dear Judge Hellerstein,

I represent the defendants, Euros El Tina Restaurant Lounge and Billiards Corp., Santiago Quezada, and Santiago Quezada, Jr. (the "Defendants") in the above referenced matter. I am writing to respectfully request an extension of the discovery deadline and for additional time to respond to Plaintiff's Motion to Compel, as I was dealing with unforeseen family circumstances.<sup>12</sup>

On May 4, 2021, based on a previous request, the Court extended the discovery deadline to June 5, 2021, [Dkt. #71]. Prior to the June 5<sup>th</sup> deadline, several of the parties who had not previously entered an appearance answered and provided some written discovery. However, none of the parties were deposed. On Saturday, June 5, 2021, Plaintiff made a motion to compel discovery.

Unfortunately, given my situation, I was unable to conduct Mr. Castro's deposition, scheduled for June 4, 2021, or respond to his discovery demands, which were served on us on May 28, 2021. Moreover, though I was aware of the motion to compel, I did not have a chance to review it until June 15, 2021, the day after my response was due. It is for this reason, that I

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<sup>1</sup> On Thursday June 3, 2021, as I was preparing for a conference call with the New York Supreme Court on another matter I received a call informing me that my partner and mother of my two children (ages: 2 years and 5 months) was being taken to the hospital. This resulted in a complete upheaval of our family, and I was obliged to set my work aside. On the afternoon of Monday June 14, 2021, she was discharged from the hospital and yesterday was my first full day back at the office.

<sup>2</sup> I have provided the details of the situation to opposing counsel, though I would prefer to keep my personal life out of public purview. Nevertheless, should the court require additional details and medical records, I can provide.

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respectfully request that the Court grant the parties until July 30, 2021, to complete discovery.<sup>3</sup> Also, I request additional time (2 weeks) to oppose Plaintiff's motion to compel.

This is the fourth request for an extension of deadlines made in this case. In addition to the one mentioned above (which was granted), Mr. Fernandez made a request for an extension of time to answer which was granted by the Court [Dkt #75]. His answer is due June 20, 2021. On June 2, 2021, Mr. Castro requested an extension of the discovery deadline [Dkt #82]. That request was denied [Dkt. #83].

Plaintiff's counsel was consulted with respect to this request and does not object. Mr. Castro's attorney consents to this application, but would like further clarification regarding deadlines.

Very truly yours,

Martin E. Restituyo



cc. All parties (VIA ECF)

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<sup>3</sup> Currently, Defendants still have three depositions to take – Plaintiff, Mr. Castro, and Mr. Fernandez's – as well as provide responses to Mr. Castro's demands. It is expected that Defendants will also be deposed.